

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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JANET MONGE,

Plaintiff

:

No. 22-cv-2942

v.

:

:

UNIVERSITY OF PENNSYLVANIA, et  
al.,

:

:

:

Defendants.

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**ORDER**

**AND NOW, this** \_\_\_\_\_ **day of August, 2022,** upon consideration of the unopposed motion of Defendant Nora McGreevy for extension of time to plead or move in response to the First Amended Complaint (Dkt. 1-4) through August 12, 2022, and for good cause shown, it is hereby

**ORDERED** that the unopposed motion is **GRANTED**, and that the defendants identified above shall have through August 12, 2022, to answer or move in response to the First Amended Complaint; Plaintiff shall have until September 1, 2022, to respond, and the defendants shall have until September 15, 2022 to file any Reply.

**BY THE COURT:**

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, J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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JANET MONGE,

Plaintiff

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No. 22-cv-2942

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UNIVERSITY OF PENNSYLVANIA, et  
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:

:

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Defendants.

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**DEFENDANT NORA MCGREEVY’S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO THE FIRST AMENDED COMPLAINT**

Defendant Nora McGreevy files this Motion for Extension of Time to Respond to the First Amended Complaint to and including August 12, 2022 and avers as follows in support thereof:

1. This action originated in the Philadelphia Court of Common Pleas at April Term, 2022, No. 1622. Plaintiff Janet Monge initiated the action by filing a Praecipe for a Writ of Summons on April 20, 2022. (Dkt. 1-1). She filed a Complaint on May 20, 2022, (Dkt. 1-2), and she filed a First Amended Complaint on June 22, 2022. (Dkt.1-4).

2. While the First Amended Complaint (Dkt. 1-4) was pending in the Philadelphia Court of Common Pleas, all parties agreed that all defendants would have until August 12, 2022, to respond to the complaint by motion or answer.

3. This case was removed to this Court on July 27, 2022.

4. Plaintiff’s counsel has represented that he agrees that all parties should have the same extension to respond to the Amended Complaint as was agreed in state court.

5. Good cause exists because the parties relied on the extension agreed to by Plaintiff's counsel and the extension is only for a little more than a week, meaning no party nor the Court will be prejudiced.

6. Defendant Nora McGreevy will not object to a reasonable request from Plaintiff to extend her time to respond to any motions that are filed. With that agreement Plaintiff consents to this Motion.

WHEREFORE, for the reasons stated in the Motion, Nora McGreevy respectfully requests that the Court grant the Motion and extend the time within which defendants must answer or move in response to the First Amended Complaint through August 12, 2022 and that the Court grant such other relief as may be just.

Date: August 3, 2022

Respectfully submitted,

/s/ Michael E. Baughman

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*Attorney for Defendant Nora McGreevy*

### **CERTIFICATE OF SERVICE**

I, Michael E. Baughman, attorney for Nora McGreevy, Defendant in this matter, certify that a copy of the foregoing Motion in Support of Motion for Extension of Time To Respond to the First Amended Complaint was filed and served electronically on all counsel of record via the Court's ECF system on August 3, 2022.

/s/ Michael E. Baughman  
Michael E. Baughman